

**To:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Thur 7/25/2013 5:18:41 PM  
**Subject:** RE: draft white paper response

Thanks Mike. I'll take a peek. Hope all is well. Interesting hearing the other day.....nice work.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**From:** (b) (6) [mailto:(b) (6)]  
**Sent:** Thursday, July 25, 2013 12:39 PM  
**To:** Argyropoulos, Paul  
**Subject:** FW: draft white paper response

Paul: Thought you might find this interesting.

**Michael McAdams | Holland & Knight**

**President, ABFA**  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone 202.469.5140 | Fax (b) (6)  
(b) (6) [www.hklaw.com](http://www.hklaw.com)

[Add to address book](#) | [View professional biography](#)

ED\_000313\_O365\_00003232

// a

---

**\*\*\*\*IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE IRS, WE INFORM YOU THAT ANY TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN BY HOLLAND & KNIGHT LLP TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING TAX-RELATED PENALTIES UNDER THE INTERNAL REVENUE CODE, OR (II) PROMOTING, MARKETING, OR RECOMMENDING TO ANOTHER PARTY ANY TAX-RELATED MATTER HEREIN.\*\*\*\***

---

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

**To:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Wed 7/17/2013 8:11:25 PM  
**Subject:** John will send you a number ——— what's your address again for the meeting? Karl and I can only stay until 10:40.....need to the head to a meeting with OMB

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**To:** beth (b) (6) beth (b) (6)  
**Cc:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Mon 7/15/2013 4:15:45 PM  
**Subject:** RE: Ashland/Valvoline Meeting Request July 23rd

Hello Beth,

Thank you for your email. I'm not sure this would fall under our offices jurisdiction, especially in terms of compliance with the federal fleet and the specific EO you reference. If there is any jurisdiction, it may be under our OSWER in one of the waste offices. I don't have a good sense of how this may be applicable to the agency other than in application of our federal vehicles and generally I believe we just comply through the agency that manages federal fleet procurement and management.

I'm sorry I can't be more helpful.

Best Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**From:** beth (b) (6) [mailto:beth (b) (6)]  
**Sent:** Tuesday, July 09, 2013 6:28 PM



To: Argyropoulos, Paul  
Cc: (b) (6)  
Subject: Ashland/Valvoline Meeting Request July 23rd

Hi Paul:

Representatives from Ashland will be in Washington on Tuesday July 23<sup>rd</sup> and would welcome an opportunity to meet with you. They would like to discuss re-refined motor oil use in the federal fleet in conjunction with Executive Order 13423. Ashland's Valvoline unit has a recycled motor oil that would help meet the goals of the EO, and result in 50% less emissions and results in 58% less resource depletion. I've attached a basic overview below.

Participants would include:

John Riley, Director of Govt Relationships at Ashland

Sarita Soldz, VP of Marketing and Product Development

John Noal, VP Valvoline's International and Commercial Business

Heather Watson, Fleet Marketing Manager, Valvoline

Rich Gold and/or Beth Viola, Holland & Knight

Please let me know if your schedule will allow for a meeting the afternoon of July 23<sup>rd</sup> to discuss.

Many thanks!

Beth

**Beth Viola | Holland & Knight**

Sr Policy Advisor

800 17th Street, NW Suite 1100 | Washington DC 20006

Phone (b) (6) | Mobile (b) (6)

(b) (6)

[Add to address book](#) | [View professional biography](#)

ED\_000313\_O365\_00003234

## **RE-REFINED MOTOR OIL USE IN FEDERAL MOTOR VEHICLES**

### **Objective**

The federal government continues to lag well behind recycling goals despite agencies being directed to use products with recycled content. Using re-refined motor oil would enable federal fleets to achieve the recycling directive established by EO 13423 and contribute to a cleaner environment by reducing related emissions by 50%. We request your assistance to communicate and enforce the requirement to use re-refined motor oil throughout the federal motor vehicle fleet.

### **Summary**

Executive Order 13423 requires federal agencies to purchase vehicular products and services made with recycled content, and using sustainable environmental practices. There are products available on the market today made with 50% or higher re-refined base oil stock. But while there are products and service providers approved for government agencies such as GSA, USDA and USPS, compliance with EO 13423 is very limited.

### **Environmental Benefits**

There are significant environmental benefits in the production and vehicular use of re-refined motor oil. It lowers emissions during processing, conserves valuable natural resources by saving oil, and helps ensure used oil stays out of our water supply. Compared to the production of the virgin base oils used in regular motor oil, the production of the base oils in certain re-refined motor oil:

- Results in up to 58% less resource depletion
- Emission levels 50% less harmful into the air
- Significantly less climate impact

Source: Used Oil Re-refining Study to Address Energy Policy Act of 2005 Section 1838, US Department of Energy, Office of Fossil Energy. Commissioned by GEIR – Group European Industry Regeneration.

### **Endorsements from Green Organizations**

The EPA has approved and listed products with re-refined oil on their CPG Product Supplier Directory under the category of Vehicular Products made with the appropriate recycled content ([www.epa.gov](http://www.epa.gov)). National publications and organizations that promote sustainable practices such as *EcoFriendly*

*Magazine, Go Green Post, Earth Garage and USA Today™* have made public endorsements of these re-refined motor oil products.

## Availability

There are over 900 retail outlets with instant oil change capabilities currently doing business in 42 states. These outlets offer oil changes and preventive maintenance for light duty passenger vehicles with discounted prices available to the federal government. Bulk re-refined oil delivery is available in 50 states and Puerto Rico for on-highway and off-highway vehicles in Class 3-8 applications.

### **Beth Viola | Holland & Knight**

Sr Policy Advisor

800 17th Street, NW Suite 1100 | Washington DC 20006

Phone (b) (6) | Mobile (b) (6)

(b) (6)

[Add to address book](#) | [View professional biography](#)

---

**\*\*\*\*IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE IRS, WE INFORM YOU THAT ANY TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN BY HOLLAND & KNIGHT LLP TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING TAX-RELATED PENALTIES UNDER THE INTERNAL REVENUE CODE, OR (II) PROMOTING, MARKETING, OR RECOMMENDING TO ANOTHER PARTY ANY TAX-RELATED MATTER HEREIN.\*\*\*\***

---

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

**To:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Mon 7/15/2013 4:11:01 PM  
**Subject:** RE: Ashland/Valvoline Meeting Request July 23rd

Yeah, on my list of people to get back with today. Not exactly sure who to meet with. The refuse / recycle people in OSW / RCRA? The Office of Atmospheric Programs group? Or some other office. May want to check with Waste office first.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**From:** (b) (6) [mailto:(b) (6)]  
**Sent:** Monday, July 15, 2013 11:57 AM  
**To:** Argyropoulos, Paul  
**Subject:** FW: Ashland/Valvoline Meeting Request July 23rd

Paul: This is my wife's client. Do you have any idea who might be interested talking about this at EPA? It's about GHG reduction, but I would not think this is in your shop. Thanks.

**Michael McAdams** | Holland & Knight  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone: (b) (6) | Fax: (b) (6)  
(b) (6) | [www.hklaw.com](http://www.hklaw.com)

[Add to address book](#) | [View professional biography](#)



**From:** Viola, Beth (WAS - X77030)  
**Sent:** Tuesday, July 09, 2013 6:28 PM  
**To:** (b) (6)  
**Cc:** McAdams, Michael J (WAS - X75140)  
**Subject:** Ashland/Valvoline Meeting Request July 23rd

Hi Paul:

Representatives from Ashland will be in Washington on Tuesday July 23<sup>rd</sup> and would welcome an opportunity to meet with you. They would like to discuss re-refined motor oil use in the federal fleet in conjunction with Executive Order 13423. Ashland's Valvoline unit has a recycled motor oil that would help meet the goals of the EO, and result in 50% less emissions and results in 58% less resource depletion. I've attached a basic overview below.

Participants would include:

John Riley, Director of Govt Relationships at Ashland  
Sarita Soldz, VP of Marketing and Product Development  
John Noal, VP Valvoline's International and Commercial Business  
Heather Watson, Fleet Marketing Manager, Valvoline  
Rich Gold and/or Beth Viola, Holland & Knight

Please let me know if your schedule will allow for a meeting the afternoon of July 23<sup>rd</sup> to discuss.

Many thanks!

Beth

**Beth Viola | Holland & Knight**  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone (b) (6) | Mobile (b) (6)  
(b) (6)

## **RE-REFINED MOTOR OIL USE IN FEDERAL MOTOR VEHICLES**

### **Objective**

The federal government continues to lag well behind recycling goals despite agencies being directed to use products with recycled content. Using re-refined motor oil would enable federal fleets to achieve the recycling directive established by EO 13423 and contribute to a cleaner environment by reducing related emissions by 50%. We request your assistance to communicate and enforce the requirement to use re-refined motor oil throughout the federal motor vehicle fleet.

### **Summary**

Executive Order 13423 requires federal agencies to purchase vehicular products and services made with recycled content, and using sustainable environmental practices. There are products available on the market today made with 50% or higher re-refined base oil stock. But while there are products and service providers approved for government agencies such as GSA, USDA and USPS, compliance with EO 13423 is very limited.

### **Environmental Benefits**

There are significant environmental benefits in the production and vehicular use of re-refined motor oil. It lowers emissions during processing, conserves valuable natural resources by saving oil, and helps ensure used oil stays out of our water supply. Compared to the production of the virgin base oils used in regular motor oil, the production of the base oils in certain re-refined motor oil:

- Results in up to 58% less resource depletion
- Emission levels 50% less harmful into the air
- Significantly less climate impact

Source: Used Oil Re-refining Study to Address Energy Policy Act of 2005 Section 1838, US Department of Energy, Office of Fossil Energy. Commissioned by GEIR – Group European Industry Regeneration.

### **Endorsements from Green Organizations**

The EPA has approved and listed products with re-refined oil on their CPG Product Supplier Directory under the category of Vehicular Products made with the appropriate recycled content ([www.epa.gov](http://www.epa.gov)). National publications and organizations that promote sustainable practices such as *EcoFriendly Magazine*, *Go Green Post*, *Earth Garage* and *USA Today*™ have made public endorsements of these re-refined motor oil products.

## Availability

There are over 900 retail outlets with instant oil change capabilities currently doing business in 42 states. These outlets offer oil changes and preventive maintenance for light duty passenger vehicles with discounted prices available to the federal government. Bulk re-refined oil delivery is available in 50 states and Puerto Rico for on-highway and off-highway vehicles in Class 3-8 applications.

### Beth Viola | Holland & Knight

Sr Policy Advisor

800 17th Street, NW Suite 1100 | Washington DC 20006

Phone (b) (6) | Mobile (b) (6)

(b) (6)

[Add to address book](#) | [View professional biography](#)

---

**\*\*\*\*IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE IRS, WE INFORM YOU THAT ANY TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN BY HOLLAND & KNIGHT LLP TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING TAX-RELATED PENALTIES UNDER THE INTERNAL REVENUE CODE, OR (II) PROMOTING, MARKETING, OR RECOMMENDING TO ANOTHER PARTY ANY TAX-RELATED MATTER HEREIN.\*\*\*\***

---

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

**To:** (b) (6) [Michael.McAdams@hklaw.com]  
**From:** Argyropoulos, Paul  
**Sent:** Mon 7/15/2013 3:50:59 PM  
**Subject:** RE: Quick Question - Never mind

Thanks..... Never mind. I found their file.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**From:** (b) (6) [mailto:(b) (6)]  
**Sent:** Monday, July 15, 2013 11:28 AM  
**To:** Argyropoulos, Paul  
**Subject:** RE: Quick Question

Let me talk with Tom. I remember it was 28% Oxygen, and had a good bit of water as well. I believe the overall BTU was around 75,000. I will get back with you after I call Tom.

**Michael McAdams** | Holland & Knight  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone 202.469.5140 | Fax (b) (6)  
(b) (6) | [www.hklaw.com](http://www.hklaw.com)

[Add to address book](#) | [View professional biography](#)



**From:** Argyropoulos, Paul [mailto:(b) (6)]  
**Sent:** Monday, July 15, 2013 11:24 AM  
**To:** McAdams, Michael J (WAS - X75140)  
**Subject:** Quick Question

Do you know the percent solids in the Enslyn RFO product? And / or the spec sheet on the fuel?

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.cpa.gov](http://www.cpa.gov)

---

**\*\*\*\*IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE IRS, WE INFORM YOU THAT ANY TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN BY HOLLAND & KNIGHT LLP TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING TAX-RELATED PENALTIES UNDER THE INTERNAL REVENUE CODE, OR (II) PROMOTING, MARKETING, OR RECOMMENDING TO ANOTHER PARTY ANY TAX-RELATED MATTER HEREIN.\*\*\*\***

---

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.



**To:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Mon 7/15/2013 3:24:11 PM  
**Subject:** Quick Question

Do you know the percent solids in the Ensyn RFO product? And / or the spec sheet on the fuel?

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: arg (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**To:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Wed 7/10/2013 12:50:39 PM  
**Subject:** RE:

I've put it on my calendar. Where?

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**From:** (b) (6) [mailto:(b) (6)]  
**Sent:** Tuesday, July 09, 2013 12:26 PM  
**To:** Argyropoulos, Paul  
**Subject:**

Paul: (b) (6) I am in board meeting mode and closing all the loops. Are you and Karl ok for 10:00 on the 18<sup>th</sup>? Thanks. Say 45 minutes. Mostly q and a. Ps, I am meeting with House Energy tomorrow, understand they are looking at a hearing the week of the 22<sup>nd</sup> of July for industry. Senate looking at September I am told.

**Michael McAdams** | Holland & Knight

**President, ABFA**  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone (b) (6) | Fax (b) (6)  
(b) (6) | [www.hklaw.com](http://www.hklaw.com)

---

**\*\*\*\*IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE IRS, WE INFORM YOU THAT ANY TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN BY HOLLAND & KNIGHT LLP TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING TAX-RELATED PENALTIES UNDER THE INTERNAL REVENUE CODE, OR (II) PROMOTING, MARKETING, OR RECOMMENDING TO ANOTHER PARTY ANY TAX-RELATED MATTER HEREIN.\*\*\*\***

---

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

**To:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Tue 6/18/2013 3:46:00 PM  
**Subject:** RE: July18th

Mike. It is Stewart ..... Not Steward. Try it again. Thanks

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**From:** (b) (6) [mailto:(b) (6)]  
**Sent:** Tuesday, June 18, 2013 11:45 AM  
**To:** Argyropoulos, Paul  
**Subject:** FW: July18th

Paul: the computer keeps kicking this back from me as the wrong email address can you push along from yours to see that it get there. Thanks.

**Michael McAdams | Holland & Knight**

**President, ABFA**  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone (b) (6) | Fax (b) (6)  
(b) (6) | [www.hklaw.com](http://www.hklaw.com)

[Add to address book](#) | [View professional biography](#)

**From:** McAdams, Michael J (WAS - X75140)  
**Sent:** Tuesday, June 18, 2013 11:42 AM  
**To:** (b) (6)  
**Cc:** 'Argyropoulos, Paul'  
**Subject:** July18th

Gwen: I had spoken to Chris about a week ago and invited him to speak at our July 18<sup>th</sup> board meeting at 10:00 am. Wanted to directly connect with you to see if it were possible to get this confirmed on his calendar. Thank you.

**Michael McAdams | Holland & Knight**

**President, ABFA**  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone (b) (6) | Fax (b) (6)  
(b) (6) | [www.hklaw.com](http://www.hklaw.com)

[Add to address book](#) | [View professional biography](#)

---

**\*\*\*\*IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE IRS, WE INFORM YOU THAT ANY TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN BY HOLLAND & KNIGHT LLP TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING TAX-RELATED PENALTIES UNDER THE INTERNAL REVENUE CODE, OR (II) PROMOTING, MARKETING, OR RECOMMENDING TO ANOTHER PARTY ANY TAX-RELATED MATTER HEREIN.\*\*\*\***

---

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

**To:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Tue 6/11/2013 4:08:52 PM  
**Subject:** Gwen's email

Steward (b) (6)

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)



**To:** McAdams J. Michael (b) (6) ]  
**From:** Argyropoulos, Paul  
**Sent:** Tue 6/11/2013 4:07:24 PM  
**Subject:** FW: Gwen Stewart email

**From:** Argyropoulos, Paul  
**Sent:** Tuesday, June 11, 2013 12:00 PM  
**To:** McAdams J. Michael  
**Subject:** Gwen Stewart email

Stewart (b) (6)

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**To:** McAdams J. Michael (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Tue 6/11/2013 3:58:23 PM  
**Subject:** Gwen Stewart email

S (b) (6)

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**To:** Michael McAdams (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Fri 6/7/2013 4:18:00 PM  
**Subject:** Re: hope you are well

Thanks Mike. I was on travel and now furlough. All is well. Hope it is with you too. Let me know when you will launch her. I'll get you some cheap champagne!

---

**From:** (b) (6)  
**Sent:** Friday, June 07, 2013 11:41:56 AM  
**To:** Argyropoulos, Paul  
**Subject:** hope you are well

Paul, have not spoken in a while, just wanted to say have a great weekend. (b) (6)  
Best.

**Michael McAdams | Holland & Knight**

**President, ABFA**  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone (b) (6) | Fax (b) (6)  
(b) (6) | [www.hklaw.com](http://www.hklaw.com)

[Add to address book](#) | [View professional biography](#)

---

**\*\*\*\*IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE IRS, WE INFORM YOU THAT ANY TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN BY HOLLAND & KNIGHT LLP TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING TAX-RELATED PENALTIES UNDER THE INTERNAL REVENUE CODE, OR (II) PROMOTING, MARKETING, OR RECOMMENDING TO ANOTHER PARTY ANY TAX-RELATED MATTER HEREIN.\*\*\*\***

---

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

**From:** Argyropoulos, Paul  
**Location:** Room - Salon ABC - at the Washington Marriott Metro Center - 775 12th Street NW  
**Importance:** Normal  
**Subject:** Accepted: Paul Argyropoulos Presentation to the NBB Board of Directors  
**Start Date/Time:** Wed 6/12/2013 1:00:00 PM  
**End Date/Time:** Wed 6/12/2013 1:45:00 PM

**From:** Argyropoulos, Paul  
**Location:** Room Salon E -- Washington Marriott Metro Center - 775 12th Street NW  
**Importance:** Normal  
**Subject:** Accepted: NBB RVO Work Group Meeting with EPA  
**Start Date/Time:** Wed 6/12/2013 1:45:00 PM  
**End Date/Time:** Wed 6/12/2013 2:45:00 PM

**To:** Brent Erickson (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Tue 6/4/2013 5:23:19 PM  
**Subject:** Re: House Oversight Hearing Wednesday updated questions

Thanks. Are these targeted primarily for the industry panel?

---

**From:** Brent Erickson  
**Sent:** Tuesday, June 04, 2013 12:25:22 PM  
**To:** Argyropoulos, Paul  
**Subject:** House Oversight Hearing Wednesday updated questions

grundler

**Brent Erickson**

Executive Vice President

Industrial and Environmental Section

Biotechnology Industry Organization (BIO)

1201 Maryland Ave. S.W. , S. 900

**From:** Argyropoulos, Paul  
**Location:** Washington Marriott at Metro Center - 775 12th St NW,  
**Importance:** Normal  
**Subject:** Accepted: NBB Member Meeting - EPA Update  
**Start Date/Time:** Wed 6/12/2013 1:00:00 PM  
**End Date/Time:** Wed 6/12/2013 2:00:00 PM

**To:** Larry Schafer (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Wed 5/22/2013 1:23:06 PM  
**Subject:** RE: Are you at your desk?

Yes.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**From:** Larry Schafer [mailto:(b) (6)]  
**Sent:** Wednesday, May 22, 2013 9:22 AM  
**To:** Argyropoulos, Paul  
**Subject:** Are you at your desk?

-----  
Larry Schafer

National Biodiesel Board

O: (b) (6)



M: (b) (6)

(b) (6)

-----  
**Biodiesel – America's Advanced Biofuel!**

[www.americasadvancedbiofuel.com](http://www.americasadvancedbiofuel.com)

1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004

**To:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Tue 5/21/2013 1:38:38 PM  
**Subject:** RE: you around today.

If it's what I think it is, I can't do it.

Also, I'm going to California on the 3 through the 5<sup>th</sup>.....

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**From:** (b) (6) (mailto:(b) (6))  
**Sent:** Tuesday, May 21, 2013 9:25 AM  
**To:** Argyropoulos, Paul  
**Subject:** RE: you around today.

Thanks Paul. I have an interesting gig for you by phone on June 3<sup>rd</sup>. Call you later.

**Michael McAdams** | Holland & Knight

**President, ABFA**  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone (b) (6) | Fax (b) (6)

(b) (6) | [www.hklaw.com](http://www.hklaw.com)

[Add to address book](#) | [View professional biography](#)

**From:** Argyropoulos, Paul [mailto:(b) (6)]  
**Sent:** Tuesday, May 21, 2013 9:23 AM  
**To:** McAdams, Michael J (WAS - X75140)  
**Subject:** RE: you around today.

Yes. Can chat later. It's pathways II rule. Will send info soon. Hopefully posting later this morning.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**From:** (b) (6) [mailto:(b) (6)]  
**Sent:** Tuesday, May 21, 2013 9:03 AM  
**To:** Argyropoulos, Paul  
**Subject:** you around today.

Paul: Hope you are well. If you have a couple minutes would love to extend an phone invitation to speak to you on behalf of a group. Also wanted to check on the Rule dropped yesterday, lots of confusion in the press and I have ducked the calls.

Michael McAdams | Holland & Knight

President, ABFA

Sr Policy Advisor

800 17th Street, NW Suite 1100 | Washington DC 20006

Phone 202.469.5140 | Fax (b) (6)

michael (b) (6) | [www.hklaw.com](http://www.hklaw.com)

[Add to address book](#) | [View professional biography](#)

---

**\*\*\*\*IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE IRS, WE INFORM YOU THAT ANY TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN BY HOLLAND & KNIGHT LLP TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING TAX-RELATED PENALTIES UNDER THE INTERNAL REVENUE CODE, OR (II) PROMOTING, MARKETING, OR RECOMMENDING TO ANOTHER PARTY ANY TAX-RELATED MATTER HEREIN.\*\*\*\***

---

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

**To:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Tue 5/21/2013 1:23:23 PM  
**Subject:** RE: you around today.

Yes. Can chat later. It's pathways II rule. Will send info soon. Hopefully posting later this morning.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**From:** (b) (6) [mailto:(b) (6)]  
**Sent:** Tuesday, May 21, 2013 9:03 AM  
**To:** Argyropoulos, Paul  
**Subject:** you around today.

Paul: Hope you are well. If you have a couple minutes would love to extend an phone invitation to speak to you on behalf of a group. Also wanted to check on the Rule dropped yesterday, lots of confusion in the press and I have ducked the calls.

**Michael McAdams | Holland & Knight**

President, ABFA  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone (b) (6) | Fax (b) (6)  
(b) (6) | [www.hklaw.com](http://www.hklaw.com)

---

**\*\*\*\*IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE IRS, WE INFORM YOU THAT ANY TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN BY HOLLAND & KNIGHT LLP TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING TAX-RELATED PENALTIES UNDER THE INTERNAL REVENUE CODE, OR (II) PROMOTING, MARKETING, OR RECOMMENDING TO ANOTHER PARTY ANY TAX-RELATED MATTER HEREIN.\*\*\*\***

---

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

**To:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Fri 5/10/2013 10:57:12 AM  
**Subject:** RE:

Sorry Mike,

I haven't been able to follow-up yet. Been swamped and staff here is hit or miss due to furloughs and too much to do. I'll see what I can find out by Monday.

Thanks.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**From:** (b) (6) [mailto:(b) (6)]  
**Sent:** Thursday, May 09, 2013 3:52 PM  
**To:** Argyropoulos, Paul  
**Subject:**

Paul: Did you get any read on how long on the Viesel part 80? Guys calling me every two days. Thanks.



Michael McAdams | Holland & Knight

President, ABFA

Sr Policy Advisor

800 17th Street, NW Suite 1100 | Washington DC 20006

Phone (b) (6) | Fax (b) (6)

(b) (6) | [www.hklaw.com](http://www.hklaw.com)

[Add to address book](#) | [View professional biography](#)

---

**\*\*\*\*IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE IRS, WE INFORM YOU THAT ANY TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN BY HOLLAND & KNIGHT LLP TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING TAX-RELATED PENALTIES UNDER THE INTERNAL REVENUE CODE, OR (II) PROMOTING, MARKETING, OR RECOMMENDING TO ANOTHER PARTY ANY TAX-RELATED MATTER HEREIN.\*\*\*\***

---

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.



**To:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Thur 5/2/2013 4:54:17 PM  
**Subject:** I will try you later from my car. Thanks

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.cpa.gov](http://www.cpa.gov)

**To:** McAdams J. Michael (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Thur 5/2/2013 4:52:21 PM  
**Subject:** I will try you later from my car. Thanks

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**To:** McAdams J. Michael (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Thur 5/2/2013 4:51:39 PM  
**Subject:** I will try you later from my car. Thanks

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**To:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Wed 4/24/2013 1:42:06 PM  
**Subject:** RE:

Maybe mischaracterized.....

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**From:** (b) (6) [mailto:(b) (6)]  
**Sent:** Wednesday, April 24, 2013 9:41 AM  
**To:** Argyropoulos, Paul  
**Subject:**

Paul: talking to one of the White House economic policy folks and they informed me that Gina was over there pitching E-85 as the answer to the current problem. ??

**Michael McAdams | Holland & Knight**  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone: (b) (6) | Fax: (b) (6)  
(b) (6) [www.hklaw.com](http://www.hklaw.com)

Add to address book | View professional biography

---

**\*\*\*\*IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE IRS, WE INFORM YOU THAT ANY TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN BY HOLLAND & KNIGHT LLP TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING TAX-RELATED PENALTIES UNDER THE INTERNAL REVENUE CODE, OR (II) PROMOTING, MARKETING, OR RECOMMENDING TO ANOTHER PARTY ANY TAX-RELATED MATTER HEREIN. \*\*\*\***

---

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

**To:** (b) (6) (b) (6)  
**From:** Argyropoulos, Paul  
**Sent:** Wed 4/17/2013 4:38:07 PM  
**Subject:** RE: Arundo?

Too little info to give you any response.

We haven't progressed much on discussions in interagency yet. Still underway. Not sure what your intel is on more pathways but you know we have the rule in play with advance biobutanol etc.....already.

I'm good. Thanks.

Hope you are as well. Really really busy.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: [www.epa.gov](http://www.epa.gov)

**From:** (b) (6) [mailto:(b) (6)]  
**Sent:** Wednesday, April 17, 2013 12:24 PM  
**To:** Argyropoulos, Paul  
**Subject:** Arundo?

Paul: hear from a company that you guys were coming out with some more pathways but no Arundo is that right? Hope you are well.

**Michael McAdams** | Holland & Knight

**President, ABFA**

Sr Policy Advisor

800 17th Street, NW Suite 1100 | Washington DC 20006

Phone (b) (6) | Fax (b) (6)  
(b) (6) | [www.hklaw.com](http://www.hklaw.com)

[Add to address book](#) | [View professional biography](#)

---

**\*\*\*\*IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE IRS, WE INFORM YOU THAT ANY TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN BY HOLLAND & KNIGHT LLP TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING TAX-RELATED PENALTIES UNDER THE INTERNAL REVENUE CODE, OR (II) PROMOTING, MARKETING, OR RECOMMENDING TO ANOTHER PARTY ANY TAX-RELATED MATTER HEREIN.\*\*\*\***

---

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.



